



October 31, 1984

US EPA RECORDS CENTER REGION 5



460193

Process & Industrial Fabrication Company  
P.O. Box 446  
Brimfield, IL 61517

Attention: Calvin J. Bragg B. S. Ch. E.

The preceding listed permit application(s) is/are DENIED because the application fails to show compliance with Section 39(a) of the Environmental Protection Act, 1981 Ill. Rev. Stat. Ch. 111 1/2, Section 1001 et seq. Section 39(a) requires that the applicant provide as part of its application "proof... that the facility, equipment, vehicle, vessel, or aircraft will not cause a violation of this Act or of regulations hereunder." The Agency is unable, based upon the pending application, to determine whether the applicant has submitted adequate proof due to the following informational deficiencies which were sent to you in the September 20, 1984 REQUEST FOR ADDITIONAL INFORMATION letter.

35 Ill. Adm. Code 201.157 (formerly Rule 103(b)(3)) specifies minimum data and information to be contained in an operating permit application. As your permit application did not contain this information, the Agency could not determine compliance with the Act and Regulations.

Specifically, the following information must be provided in order for the Agency to determine compliance of your PIFCO-DESTRUCTIVE DISTILLATION UNIT with the Regulations:

- (1) During the meeting on Friday, September 7, 1984 it was disclosed that all film chips were to be treated at a single site in Rosemont Illinois. Please submit a letter requesting the deletion of the other sites and provide a plot plan for the new site in Rosemont.
- (2) A dimensioned drawing of the PIFCO Unit should be submitted as part of the application.
- (3) A material and energy balance of the system should be submitted as part of the operation.
- (4) An operational description of the unit shall be provided including emission monitoring procedures and equipment.
- (5) A compliance demonstration plan shall be submitted with a detailed startup and emission testing program. It shall specify at a minimum the following information:



- a. Schedule for startup and testing program.
- b. Total amount of film chips to be used for the purpose of demonstrating compliance.
- c. Startup feed rates.
- d. Testing and analysis methods for particulates and carbon monoxide.
- e. Commercial operation is to begin only after review and approval of the emission test results.

In addition, the Agency had noted several other deficiencies which were presented to you in writing during the September 7, 1984 meeting. A list of these is reported for your information in reapplying but it does not necessarily include all such deficiencies, even in the information which has been submitted, because the Agency has not conducted a complete review due to the application's informational deficiencies noted above:

(1) Please provide the following information:

- A. Signatures of the owner, operator, and professional engineer.
- B. A topographical map and a 100-year flood map for each site that will be treated.
- C. The hours of operation.
- D. The number and duties of employees.
- E. The precautions for explosion or spills.
- F. The methods to control dust and odors -- describe protection from wind.
- G. Daily clean-up procedures.

(2) Where will the incinerator sit? Please show the place on a map.

(3) Please describe what alarms and fire fighting equipment will be used to stop or prevent explosions.

(4) Please provide a description of and a plan sheet showing the following:

- A. Any primary or secondary containment control systems.
- B. Storm sewers and provisions for preventing or managing run-on and run-off.

(5) Please provide the inspection procedures and schedules for your incinerating unit.



(6) Please provide the following information:

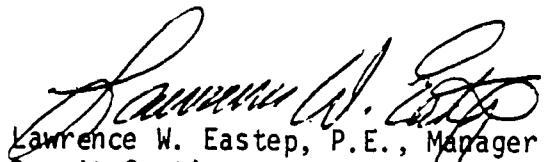
- A. A cost estimate and financial assurance for closure and post-closure of site.
- B. How will you prevent contaminated water from entering the sewer system?
- C. Where will the soil, wash and blacktop waste from the clean-up go?
- D. What will happen to the storage trailers?
- E. How will you get the trailers to the incinerating unit?

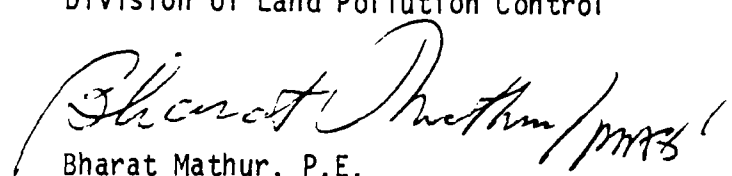
(7) Please provide engineering diagrams and information on the following:

- A. High-VAR air transport system.
- B. Portable lighting system.
- C. Trailer-mounted destructive distillation system.

The Agency will be pleased to conduct a complete review upon receipt of (a) new application(s) containing all necessary information.

If you have any questions concerning this letter, please contact Marla Laymon, DLPC, 217/782-6760 or Jim Cobb, DAPC, 217/782-2113.

  
Lawrence W. Eastep, P.E., Manager  
Permit Section  
Division of Land Pollution Control

  
Bharat Mathur, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

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cc: Region 1 - DAPC  
Northern Region-DLPC